

**Roe, Camille L. (Kansas City)**

---

**From:** Roe, Camille L. (Kansas City)  
**Sent:** Monday, December 09, 2019 10:44 AM  
**To:** rodshaewatkins@gmail.com  
**Cc:** Glickstein, Karen R. (Kansas City)  
**Subject:** FW: Activity in Case 2:19-cv-02114-KHV-ADM Watkins v. Correct Care Solutions, LLC Order  
**Attachments:** ECF #47 First Amended Scheduling Order (11.21.19).pdf; DRAFT - Pretrial Order TO WATKINS.docx  
**Importance:** High

Good Morning Ms. Watkins,

I am writing once more regarding the Pre-trial order which is due to the Court by **December 13**.

We have not heard back from you regarding my email below and we have not received your portions of the pre-trial order. Without your completed portions of the pre-trial order, we cannot complete the form and are at risk of being non-compliant with the Court's Amended Scheduling Order.

Please get back to us as soon as possible regarding this matter. My direct dial and cell phone numbers are below if you need to reach me by phone.

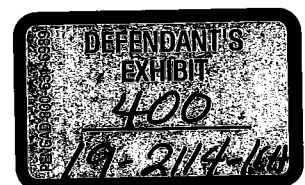
Thank you,  
Camille

**Camille L. Roe**  
Attorney at Law  
**Jackson Lewis P.C.**  
7101 College Blvd.  
Suite 1200  
Overland Park, KS 66210  
Direct: 913-251-3727 | Main: (913) 981-1018  
Camille.Roe@jacksonlewis.com | www.jacksonlewis.com

**From:** Roe, Camille L. (Kansas City) <Camille.Roe@jacksonlewis.com>  
**Sent:** Wednesday, November 27, 2019 10:01 AM  
**To:** rodshaewatkins@gmail.com  
**Cc:** Glickstein, Karen R. (Kansas City) <Karen.Glickstein@jacksonlewis.com>  
**Subject:** RE: Activity in Case 2:19-cv-02114-KHV-ADM Watkins v. Correct Care Solutions, LLC Order  
**Importance:** High

Ms. Watkins,

Please see the attached First Amended Scheduling Order extending certain deadlines in your lawsuit against Correct Care Solution.



The Court has extended the deadline for the parties' submission of the Pre-trial Order. I have attached a draft of the Pre-trial Order form for your reference.

As I have explained in prior emails, the Court requires that both parties complete the attached document. Defendant cannot complete its portions of the document until we receive your completed portions.

**We need your completed portion by no later than December 6, 2019 to ensure we meet the Court's December 13 deadline.**

**If for some reason you are unable to complete your portion of the document, please let us know as soon as possible.** You can respond to this email or give me a call at either my direct line (which is listed below) or on my cell phone 816-699-0591. If I do not answer, please leave a message and I will promptly return your call.

**Camille L. Roe**  
Attorney at Law  
**Jackson Lewis P.C.**  
7101 College Blvd.  
Suite 1200  
Overland Park, KS 66210  
Direct: 913-251-3727 | Main: (913) 981-1018  
Camille.Roe@jacksonlewis.com | www.jacksonlewis.com

**From:** Roe, Camille L. (Kansas City) <Camille.Roe@jacksonlewis.com>  
**Sent:** Monday, November 04, 2019 4:55 PM  
**To:** [rodshaewatkins@gmail.com](mailto:rodshaewatkins@gmail.com)  
**Cc:** Glickstein, Karen R. (Kansas City) <[Karen.Glickstein@jacksonlewis.com](mailto:Karen.Glickstein@jacksonlewis.com)>  
**Subject:** FW: Activity in Case 2:19-cv-02114-KHV-ADM Watkins v. Correct Care Solutions, LLC Order  
**Importance:** High

Ms. Watkins,

Please see the Court's Order below extending the deadline for the parties' submission of the Pre-trial Order to **Thursday, Nov. 7.**

The Court has directed you to participate in the drafting of the Pre-trial Order. Please provide your portions of the Pre-trial Order to us **by no later than the close of business tomorrow, November 5,** so that we can add our portions and submit the same to the Court.

If my memory serves, you are usually off work on Tuesdays. I am generally available any time after 10:00 a.m. tomorrow if you would like to discuss this matter over the phone. My mobile number is (816) 699-0591.

We look forward to hearing from you.

Camille

**Camille L. Roe**  
Attorney at Law  
**Jackson Lewis P.C.**

7101 College Blvd.  
Suite 1200  
Overland Park, KS 66210  
Direct: 913-251-3727 | Main: (913) 981-1018  
Camille.Roe@jacksonlewis.com | www.jacksonlewis.com

**From:** [KSD\\_CMECF@ksd.uscourts.gov](mailto:KSD_CMECF@ksd.uscourts.gov) <[KSD\\_CMECF@ksd.uscourts.gov](mailto:KSD_CMECF@ksd.uscourts.gov)>  
**Sent:** Monday, November 04, 2019 4:39 PM  
**To:** [ksd\\_nef@ksd.uscourts.gov](mailto:ksd_nef@ksd.uscourts.gov)  
**Subject:** Activity in Case 2:19-cv-02114-KHV-ADM Watkins v. Correct Care Solutions, LLC Order

This is an automatic e-mail message generated by the CM/ECF system. Please **DO NOT RESPOND** to this e-mail because the mail box is unattended.

**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

DISTRICT OF KANSAS

## Notice of Electronic Filing

The following transaction was entered on 11/4/2019 at 4:38 PM CST and filed on 11/4/2019

**Case Name:** Watkins v. Correct Care Solutions, LLC

**Case Number:** 2:19-cv-02114-KHV-ADM

**Filer:**

**Document Number:** 42(No document attached)

### Docket Text:

**ORDER.** The court extends the deadline for the parties to submit the proposed pretrial order to November 7, 2019. Plaintiff is directed to participate in drafting the proposed pretrial order. The court reminds plaintiff that the proposed pretrial order must be a joint effort from the parties who have an equal obligation to cooperate fully in its creation. Signed by Magistrate Judge Angel D. Mitchell on 11/4/19. Mailed to pro se plaintiff Rodshae Watkins by regular mail. (This is a TEXT ENTRY ONLY. There is no.pdf document associated with this entry.) (ks)

2:19-cv-02114-KHV-ADM Notice has been electronically mailed to:

Karen R. Glickstein [Karen.Glickstein@jacksonlewis.com](mailto:Karen.Glickstein@jacksonlewis.com), [Karen.Elliott@jacksonlewis.com](mailto:Karen.Elliott@jacksonlewis.com),  
[amanda.sisney@jacksonlewis.com](mailto:amanda.sisney@jacksonlewis.com), [kansascitydocketing@jacksonlewis.com](mailto:kansascitydocketing@jacksonlewis.com)

Katrina Y. Robertson (Terminated) [kyr@kyrobertsonlaw.com](mailto:kyr@kyrobertsonlaw.com)

Camille L. Roe [camille.roe@jacksonlewis.com](mailto:camille.roe@jacksonlewis.com), [kansascitydocketing@jacksonlewis.com](mailto:kansascitydocketing@jacksonlewis.com),  
[krystle.hartley@jacksonlewis.com](mailto:krystle.hartley@jacksonlewis.com)

Rodshae Watkins [kyr@kyrobertsonlaw.com](mailto:kyr@kyrobertsonlaw.com)

**2:19-cv-02114-KHV-ADM Notice has been delivered by other means to:**

## **Roe, Camille L. (Kansas City)**

---

**From:** Roe, Camille L. (Kansas City)  
**Sent:** Monday, November 04, 2019 1:26 PM  
**To:** rodshaewatkins@gmail.com  
**Cc:** Glickstein, Karen R. (Kansas City)  
**Subject:** FW: Watkins v. Correct Care Solutions - PLEASE RESPOND ASAP  
**Attachments:** DRAFT - Pretrial Order TO WATKINS.docx  
  
**Importance:** High

Good Afternoon Ms. Watkins,

I am writing once more regarding the Pre-trial order which is due to the Court by tomorrow, November 5.

We have not heard back from you regarding your portions of the order. Without your completed portions of the pre-trial order, we cannot complete the form and are at risk of being non-compliant with the Court's Scheduling Order.

Please get back to us as soon as possible regarding this matter. My direct dial and cell phone numbers are below if you need to reach me by phone.

Thank you,  
Camille

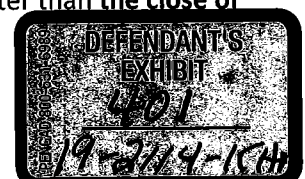
**Camille L. Roe**  
Attorney at Law  
**Jackson Lewis P.C.**  
7101 College Blvd.  
Suite 1200  
Overland Park, KS 66210  
Direct: 913-251-3727 | Main: (913) 981-1018  
Camille.Roe@jacksonlewis.com | www.jacksonlewis.com

**From:** Roe, Camille L. (Kansas City) <Camille.Roe@jacksonlewis.com>  
**Sent:** Friday, November 01, 2019 11:13 AM  
**To:** rodshaewatkins@gmail.com  
**Cc:** Glickstein, Karen R. (Kansas City) <Karen.Glickstein@jacksonlewis.com>  
**Subject:** FW: Watkins v. Correct Care Solutions - PLEASE RESPOND ASAP  
**Importance:** High

Good Morning Ms. Watkins,

I am sending a quick follow-up email to confirm our phone conversation this morning regarding your lawsuit against Correct Care Solutions and the attached Pre-trial Order.

As I explained during our phone call, the pre-trial order is due to the Court by November 5, 2018. Additionally, I reiterated our need to have your competed portions of the Pre-trial Order sent to us by no later than **the close of**



**business today**, so that we can add our portions to the document and submit the Pre-trial Order to the Court on or before next Tuesday's deadline.

During the call, you asked for my contact numbers, in case you need to reach me with questions. My direct dial and cell phone numbers are in the email directly below.

I look forward to hearing from you soon.

Camille

**Camille L. Roe**  
Attorney at Law  
**Jackson Lewis P.C.**  
7101 College Blvd.  
Suite 1200  
Overland Park, KS 66210  
Direct: 913-251-3727 | Main: (913) 981-1018  
Camille.Roe@jacksonlewis.com | www.jacksonlewis.com

**From:** Roe, Camille L. (Kansas City) <Camille.Roe@jacksonlewis.com>  
**Sent:** Thursday, October 31, 2019 12:22 PM  
**To:** [rodshaewatkins@gmail.com](mailto:rodshaewatkins@gmail.com)  
**Cc:** Glickstein, Karen R. (Kansas City) <Karen.Glickstein@jacksonlewis.com>  
**Subject:** FW: Watkins v. Correct Care Solutions - PLEASE RESPOND ASAP  
**Importance:** High

Good Afternoon Ms. Watkins,

Since I did not hear back from you concerning my initial email sent on Monday, Oct. 28, I am following up to check in on your progress with completing your portion of the attached Pre-Trial Order.

As I explained in my email below, the Court requires that both parties complete the attached document. Defendant cannot complete its portions of the document until we receive your completed portions. We need your completed portion **by no later than the close of business today** to ensure we meet the Court's November 5, 2019 filing deadline.

**If for some reason you are unable to complete your portion of the document, please let us know as soon as possible.** You can respond to this email or give me a call at either my direct line (which is listed below) or on my cell phone 816-699-0591. If I do not answer, please leave a message and I will promptly return your call.

Thank you,  
Camille

**Camille L. Roe**  
Attorney at Law  
**Jackson Lewis P.C.**  
7101 College Blvd.  
Suite 1200  
Overland Park, KS 66210  
Direct: 913-251-3727 | Main: (913) 981-1018

**From:** Roe, Camille L. (Kansas City)  
**Sent:** Monday, October 28, 2019 9:23 AM  
**To:** [rodshaewatkins@gmail.com](mailto:rodshaewatkins@gmail.com)  
**Cc:** Glickstein, Karen R. (Kansas City) <[Karen.Glickstein@jacksonlewis.com](mailto:Karen.Glickstein@jacksonlewis.com)>  
**Subject:** Watkins v. Correct Care Solutions - PLEASE RESPOND ASAP  
**Importance:** High

Ms. Watkins,

**Please respond to this email to confirm receipt.** Below is very important information regarding your lawsuit against Correct Care Solutions.

Attached for your review is a draft of the Pre-trial Order, which the Court requires the parties to jointly complete and submit before the Final Pre-Trial Conference.

In order for Defendant to complete its portions of the Pre-trial Order we need for you to fill in the "Factual Contentions," "Legal Contentions," and "Damages" sections. For ease of reference, those areas have been highlighted and bolded in the document.

Additionally, we have drafted proposed Stipulations for your review. Both parties must agree to the facts listed in sub-section a, along with the admissibility of the documents listed in sub-section b. If you have other facts or documents you wish to add to this section, please provide those for our review as soon as possible.

Please complete your sections and provide any additional stipulations for our review by no later than 5pm on **Thursday, October 30** so that we will have sufficient time to review any additional stipulations (and discuss, if necessary), prepare our factual and legal contentions, and finalize the document for submission to the Court by the November 5, 2019 due date.

We look forward to hearing from you soon.

Thank you,  
Camille